

**KELLEY DRYE & WARREN LLP**

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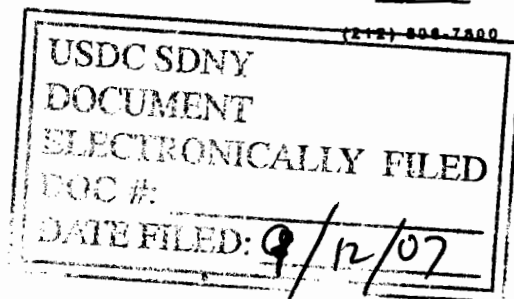
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September 10, 2007

*Time is delayed,  
as requested, to 10/10/07.  
9-12-07  
[Signature]*

VIA FACSIMILE (212) 805-7942

Honorable Alvin K. Hellerstein  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1050  
New York, New York 10007

Re: Edwards v. American Express Company  
Civil Action No. 07-7340 (AKH)

Dear Judge Hellerstein:

My firm was only recently retained to represent Defendant, American Express Company, in connection with the above-referenced matter. Due to a delay in the complaint reaching the appropriate individuals within the Company, coupled with my vacation schedule over the holiday weekend, I did not learn of the action until Friday, September 7, 2007. Defendant's time to respond to the complaint expires today.

I immediately attempted to contact plaintiff's counsel, Locksley O. Wade, Esq., to request a 30-day extension of time in which to respond to the Complaint, calling Mr. Wade and sending him a letter and stipulation. I received no response until today, when Mr. Wade advised that he would not consent to the extension of time unless Defendant waived its right to make a dispositive motion and answered the complaint by September 19, 2007. A copy of Mr. Wade's e-mail to this effect is attached hereto for the Court's review.

I respectfully make this letter-application to Your Honor, requesting until October 10, 2007 to answer, move, or otherwise respond to the Complaint. We thank Your Honor for his kind consideration of this request and apologize for bothering the Court with an issue that should have been a simple matter of professional courtesy.

Respectfully submitted,

Jean Y. Park (JYP-8073)

Attachment

cc: Locksley O. Wade, Esq. (via facsimile and email)

**Park, Jean Y.**

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**From:** Wilson, Leigh Ann  
**Sent:** Monday, September 10, 2007 9:59 AM  
**To:** Park, Jean Y.  
**Subject:** FW: FW: Yasmina Edwards v. American Express Company, Civil Action No. 07-7340 (AKH)  
**Importance:** High


Please see response from Mr. Wade.

-----Original Message-----

**From:** Locksley O. Wade, Esq. [mailto:lwade@lwade-law.com]  
**Sent:** Monday, September 10, 2007 9:50 AM  
**To:** Wilson, Leigh Ann  
**Subject:** Re: FW: Yasmina Edwards v. American Express Company, Civil Action No. 07-7340 (AKH)  
**Importance:** High

Please prepare another stipulation with the added phrase that you will file no other pleading other "than an ANSWER on or before the 19th of September 2007."

Please acknowledge receipt of this e-mail.

  
LOCKSLEY O. WADE, ESQ.  
15 West 39th Street, 3rd Floor  
New York, NY 10018  
(212) 220-3610 Telephone  
(212) 253-4142 Facsimile  
<http://lwade-law.com>

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Wilson, Leigh Ann wrote:

-----Original Message-----  
**From:** Wilson, Leigh Ann  
**Sent:** Friday, September 07, 2007 5:29 PM  
**To:** 'lwade@L-WADELAW.com'  
**Cc:** Park, Jean Y.  
**Subject:** Yasmina Edwards v. American Express Company, Civil Action No. 07-7340 (AKH)

Please see attached sent on behalf of Jean Y. Park.

<<L to Wade re Stipulation (AMEX-EDWARDS).pdf>> <<Stipulation Extending Defendant's Time To

9/10/2007